

# Slavery and Human Trafficking Statement

## 1. About Bristows LLP

- 1.1. Bristows LLP is a limited liability partnership registered in England under registration number: OC358808 and is authorised and regulated by the Solicitors Regulation Authority.
- 1.2. We provide legal services to international and UK clients. We hold offices in London and Brussels, but during the COVID-19 pandemic most of our personnel were working remotely in accordance with government guidance.

## 2. Risk Assessment

- 2.1. As a regulated firm that provides professional services, we consider that we are at low risk of slavery or human trafficking occurring within our own business.
- 2.2. However, we are committed to taking steps to ensure that it does not occur in any of our supply chains. Our key suppliers that are most likely to present a risk include those that provide support in delivering office-based business services, generally related to facilities management.
- 2.3. Due to the nature of the business conducted by the firm, we do not consider that there is a significantly increased risk of issues relating to slavery or human trafficking arising within our own business or our supply chains as a result of the COVID-19 pandemic.

## 3. Slavery and Human Trafficking Policy

- 3.1. Our Slavery and Human Trafficking Policy is published on our intranet and applies to everyone who works for us.
- 3.2. Our Whistleblowing Policy is published on our intranet and ensures that anyone who works for us can raise any concerns about conduct or compliance confidentially (including concerns in relation to slavery and human trafficking) and be assured that these concerns will be dealt with appropriately.
- 3.3. As these policies are available online to everyone who works for us, and we provide sufficient means for reporting any issues related to slavery or human trafficking, we do not consider that these policies require updating as a result of the COVID-19 pandemic.

## 4. Our Supply Chains

- 4.1. Our Slavery and Human Trafficking Policy sets out how we manage our supply chains and includes the requirements set out below.
- 4.2. As part of our processes for contracting with new suppliers and renewing contracts with existing suppliers, we must, where reasonably practicable and appropriate: i) include specific prohibitions in our contracts with our suppliers against slavery and human trafficking, including a right for us to terminate the arrangement if the supplier breaches its obligations under the Modern Slavery Act 2015; and ii) check that the supplier has an appropriate slavery and human trafficking policy in place and/or has published a current slavery and human trafficking statement if the supplier is required to do so by the Modern Slavery Act 2015.
- 4.3. We must terminate our relationship with a supplier if they or their contractors and suppliers tolerate slavery or human trafficking in any part of their business or supply chains.
- 4.4. The heads of our business services operations must be trained on our Slavery and Human Trafficking Policy and all of our personnel must be made aware of our Slavery and Human Trafficking Policy.
- 4.5. Due to the nature of the goods and services procured by the firm, we do not consider that there is a significantly increased risk of issues relating to slavery or human trafficking arising in our supply chains as a result of the COVID-19 pandemic.

## 5. Summary of Steps Undertaken During the Previous Year

- 5.1. Members of our Slavery and Human Trafficking Committee, which includes the heads of our business services operations, have considered the steps we have taken in the previous year and we have updated our Slavery and Human Trafficking Statement accordingly.
- 5.2. Our Slavery and Human Trafficking Policy is available to all of our personnel and our Slavery and Human Trafficking Committee has continued to monitor and identify indicators of slavery or human trafficking in our supply chains.
- 5.3. We have made it compulsory for a broader cross-section of our personnel to carry out additional training on slavery and human trafficking, including all of our personnel in teams who have responsibility for liaising with recruitment agencies and procuring goods and services.
- 5.4. We decided to submit our Slavery and Human Trafficking Statements for publication on the UK government's Modern Slavery Registry.
- 5.5. We have endeavoured to incorporate our standard clauses against slavery and human trafficking into any new contracts with existing and new suppliers.
- 5.6. We have carried out risk assessments on new suppliers (and continued to monitor existing supply chains across our business) to identify those suppliers we considered to be most likely to be at risk of having slavery or human trafficking in their businesses or supply chains. Due to the outbreak of the COVID-19 pandemic and the nature of the goods and services procured by the firm, we appointed a limited number of new suppliers during this period and we did not identify any that were at such risk.

## 6. Next Steps

- 6.1. The Slavery and Human Trafficking Committee will continue to monitor our supply chains to identify any risk of slavery and human trafficking and will review and update our Slavery and Human Trafficking Risk List.
- 6.2. Where we identify new suppliers as being at risk and such suppliers do not have slavery and human trafficking statements, we will continue to seek appropriate assurances from those suppliers that: i) there is no slavery or human trafficking in any part of their business; and ii) they are taking active steps to ensure that there is no slavery or human trafficking in any part of their supply chains.
- 6.3. We will submit our Slavery and Human Trafficking Statement to the government's Modern Slavery Registry.
- 6.4. We will continue to endeavour to include our standard clauses against slavery and human trafficking in any new contracts with existing and new suppliers.
- 6.5. We will continue to provide compulsory training to a targeted cross-section of our personnel on slavery and human trafficking, including all of our personnel in teams who have responsibility for liaising with recruitment agencies and procuring goods and services.
- 6.6. We will provide a notification to all of our personnel that we have updated our Slavery and Human Trafficking Statement, which will contain a reminder of where they can access our Slavery and Human Trafficking Policy.
- 6.7. We will continue to monitor government guidance and reports regarding the Modern Slavery Act 2015, particularly in relation to amendments to applicable legislation and additional government guidance, and consider updates to our internal procedures in light of such amendments and information.

This is Bristows LLP's Slavery and Human Trafficking Statement for the financial year 2020/2021 and it was approved by the membership of Bristows LLP on 21 October 2021.



**Joint Managing Partner**

**Bristows LLP**

**1 November 2021**